510(k) SUBSTANTIAL EQUIVALENCE DETERMINATION DECISION SUMMARY ASSAY ONLY TEMPLATE

	k1.	31565
B.	Pu	rpose for Submission:
	Ne	w Device
C.	Me	easurand:
	Ge	notype of cytochrome P450 2C19 (CYP2C19)
D.	Ту	pe of Test:
	Qu	alitative nucleic acid multiplex genotyping assay
E.	Ap	pplicant:
	Lu	minex Molecular Diagnostics Inc.
F.	Pr	oprietary and Established Names:
	хT	AG® CYP2C19 Kit v3
G.	Re	gulatory Information:
	1.	Regulation section:
		21 CFR §862.3360, Drug Metabolizing Enzyme Genotyping Systems
	2.	<u>Classification:</u>
		Class II
	3.	Product code:
		NTI, Drug Metabolizing Enzyme Genotyping Systems

A. 510(k) Number:

4. Panel:

Toxicology (91)

H. Intended Use:

1. Intended use(s):

See Indications for use below

2. Indication(s) for use:

The xTAG® CYP2C19 Kit v3 is an *in vitro* diagnostic test used to simultaneously detect and identify a panel of nucleotide variants found within the highly polymorphic CYP450 2C19 gene, located on chromosome 10q24, from genomic DNA extracted from EDTA or citrate anticoagulated whole blood samples. The xTAG® CYP2C19 Kit v3 is a qualitative genotyping assay which can be used as an aid to clinicians in determining therapeutic strategy for the therapeutics that are metabolized by the CYP2C19 gene product, specifically *2, *3, and *17. The kit is not indicated for stand-alone diagnostic purposes. This test is not intended to be used to predict drug response or non-response.

The xTAG® CYP2C19 Kit v3 is indicated for use with the Luminex® 100/200TM instrument or MAPGIX® system with xPONENT® software systems.

3. Special conditions for use statement(s):

For prescription use only

4. Special instrument requirements:

Luminex[®] 100/200TM instrument or MAGPIX[®] system with xPONENT[®] software.

I. Device Description:

The xTAG® CYP2C19 Kit v3 includes the following components:

- xTAG® CYP2C19 Kit v3 PCR Primer Mix
- xTAG® CYP2C19 Kit v3 ASPE PCR Primer Mix
- xTAG® Shrimp Alkaline Phosphatase
 xTAG® Exonuclease I
 xTAG® Hot Start Taq
 xTAG® CYP2C19 Kit v3 Bead Mix

- xTAG[®] Reporter Buffer

- xTAG[®] 10x HS Taq polymerase Buffer
 xTAG[®] Reporter Buffer
 xTAG[®] Streptavidin, R-Phycoerythrin Conjugate G75
 CD containing: Software protocol/template including parameters for data acquisition, software for data analysis (TDAS), an electronic copy of the package insert and TDAS CYP2 C19 software user manual.

J. Substantial Equivalence Information:

1. Predicate device name(s):

INFINITI CYP2C19 Assay

2. Predicate 510(k) number(s):

k101683

3. Comparison with predicate:

	Similarities	
Item	Candidate Device: xTAG® CYP2C19 Kit v3	Predicate Device: INFINITI CYP2C19 Assay
	(k121958)	(k101683)
Intended Use	To simultaneously detect and identify a panel of nucleotide variants within the highly polymorphic CYP2C19 gene, located on chromosome 10q23, from genomic DNA. Can be used as an aid to clinicians in determining therapeutic strategy for the therapeutics that are metabolized by the CYP2C19 gene product.	Same
Sample Preparation	Genomic DNA extracted from blood	Same
Amplification Method	Multiplex PCR	Same
Detection Method	Fluorescence Based	Same
Target Gene	CYP2C19	Same
Results	Qualitative	Same
Target Mutations	*2, *3, *17	Same

	Differences								
Item	Candidate Device:	Predicate Device:							
	xTAG [®] CYP2C19 Kit v3	INFINITI CYP2C19 Assay							
	(k121958)	(k101683)							
Specimen Type	Genomic DNA from EDTA	Genomic DNA from							
	or citrate anticoagulated	EDTA anticoagulated							
	whole blood samples	whole blood samples							
Test Principle	Multiplex bead-based	Microarray comprised of a							
	universal array sorting on	polyester film coated with							
	the Luminex [®] 100/200 TM or	proprietary multi-layer							
	MAGPIX [®] system	components designed for							
	instrument	DNA analysis							
Instrument	Luminex [®] 100/200 TM or	INFINITI Analyzer							
	MAGPIX® system with								
	xPONENT [®] software								

K. Standard/Guidance Document Referenced (if applicable):

- CLSI MM13-A Collection, Transport, Preparation, and Storage of Specimens, 2005
- CLSI Guideline EP5-A2, Evaluation of Precision Performance of Quantitative Measurement Methods-2nd Ed., 2004
- CLSI Guideline EP7-A2, Interference Testing in Clinical Chemistry; Approved Guideline-2nd Ed., 2005
- CLSI EP12-A2 User Protocol for Evaluation of Qualitative Test Performance, 2008
- CLSI EP14-A2 Evaluation of Matrix Effects- 2nd Ed., 2005
- CLSI EP15-A2 User Verification of Performance for Precision and Trueness; Approved Guideline-2nd Ed., 2005
- CLSI EP17-A Protocol for Determination of Limit of Detection and Limits of Ouantitation, 2004
- CEN 13649 Stability testing of In Vitro Diagnostic Reagents, 2002
- ISO 14971:2007 Medical devices-Application of risk management to medical devices 2007
- ISO 15223-1 Medical devices- Symbols to be used with medical device labels, labeling, and information to be supplied, 2007
- IEC 62304 Ed. 1.0 Medical device software-Software life cycle processes, 2006

L. Test Principle:

Genomic DNA is amplified in a multiplex PCR and the PCR product is treated to inactivate any remaining nucleotides and to degrade any primers left over from the PCR reaction. Allele-specific primer extension (ASPE) is then carried out using universally-tagged primers supplied in the ASPE primer mix. The ASPE reaction is then hybridized with the universal array and labeled with a fluorescent reporter solution. The samples are read on the Luminex®

100/200™ or MAGPIX® instrument and the Median Fluorescence Intensity (MFI) value is analyzed to determine whether the samples are wild-type, heterozygous, or mutant for each of the variants. The variant results are used to determine a genotype for each sample.

The variant results are then used to determine a genotype for each sample. The variants detected by the xTAG® CYP2C19 Kit v3 assay are shown below.

Single-nucleotide polymorphisms (SNPs) detected by xTAG[®] CYP2C19 Kit v3

Alleles	SNPs
	Detected
*2	19154G>A
*3	17948 G>A
*17	-806C>T

M. Performance Characteristics (if/when applicable):

1. Analytical performance:

a. Precision/Reproducibility:

Twenty-four whole blood samples were used to study site-to-site, lot-to-lot, and operator-to-operator reproducibility for the xTAG® CYP2C19 Kit v3. Six of the samples were collected in blood collection tubes containing citrate and the remaining eighteen were collected in blood collection tubes containing EDTA. Two operators at each site performed one run per day on three non-consecutive days at three sites on both the Luminex® 100/200TM instrument using the xPONENT® 3.1 software and on the MAGPIX® instrument with the xPONENT® 4.2 software. Three different extraction methods were used. All samples were sequenced using bi-directional DNA sequencing to establish the genotype. The results are as follows:

Luminex[®] 100/200TM Instrument with xPONENT[®] 3.1 Software

Genotype	#	#	Total # of	#	# No	#	95%	%
	Samples	Replicates	Replicates	Correct	Calls	Incorrect	LCB	
		per	Per	Calls		Calls		Agreement
		sample	genotype					
*1/*1	6	36	216	216	0	0	98.3	100.0
*1/*2	4	36	144	144	0	0	97.5	100.0
*1/*3	1	36	36	36	0	0	90.3	100.0
*1/*17	5	36	180	180	0	0	98	100.0
*2/*2	2	36	72	72	0	0	95	100.0
*2/*3	1	36	36	36	0	0	90.3	100.0
*2/*17	2	36	72	72	0	0	95	100.0
*3/*17	1	36	36	36	0	0	90.3	100.0
*17/*17	2	36	72	72	0	0	95	100.0
Total	24	864	864	864	0	0	99.6	100.0

MAGPIX® Instrument with xPONENT® 4.2 Software

Genotype	#	#	Total # of	#	#	#	95%	%
	Samples	Replicates	Replicates	Correct	No	Incorrect	LCB	
		per	Per	Calls	Calls	Calls		Agreement
		sample	genotype					
*1/*1	6	36	216	216	0	0	98.3	100.0
*1/*2	4	36	144	144	0	0	97.5	100.0
*1/*3	1	36	36	36	0	0	90.3	100.0
*1/*17	5	36	180	180	0	0	98	100.0
*2/*2	2	36	72	72	0	0	95	100.0
*2/*3	1	36	36	36	0	0	90.3	100.0
*2/*17	2	36	72	72	0	0	95	100.0
*3/*17	1	36	36	36	0	0	90.3	100.0
*17/*17	2	36	72	72	0	0	95	100.0
Total	24	864	864	864	0	0	99.6	100.0

b. Linearity/assay reportable range:

Not Applicable

c. Traceability, Stability, Expected values (controls, calibrators, or methods):

The xTAG® CYP2C19 Kit v3 does not require calibration. Quality control materials are not provided with the kit. The package insert states that previously characterized clinical samples or commercially available 2C19 controls are recommended for quality control testing. All quality control requirements and testing should be performed in conformance with local, state, and/or federal regulations or requirement.

The sponsor recommends that extracted genomic DNA samples be stored at 2-8°C for up to two weeks. For longer term storage, the sponsor recommends storing the extracted DNA at -80°C.

Stability information supports that up to seven freeze-thaw cycles of the xTAG[®] CYP2C19 Kit v3 does not compromise the integrity of the xTAG[®] CYP2C19 Kit v3. Real time stability studies are ongoing. To date, studies demonstrate that the kit is stable for 12 months.

d. Detection limit:

The upper and lower limits of detection of the xTAG® CYP2C19 Kit v3 were determined on the Luminex® $100/200^{TM}$ instrument using the xPONENT® 3.1 software and on the MAGPIX® instrument with the xPONENT® 4.2 software. Five genomic DNA samples (*1/*2, *17/*17, *1/*1, *1/*17, *2/*3) and one whole blood sample (*2/*2) were tested in triplicate across a series of dilutions (whole blood: 0.01, 0.1, 0.5, 2.5, 5.0, 10.0, 50.0 and 111.33 ng/µL; genomic DNA samples: 0.01, 0.1, 0.5, 2.5, 5.0, 10.0, 50.0, 150.0, and 300.0 ng/µL). The no-call rate was 100% at 0.01 ng/µL and 5.66% at 0.1 ng/µL with both instruments; however, there were no incorrect calls on either instrument. No assay failures were observed at the maximum concentration (approximately 300.00 ng/µL); therefore, the upper bound of the assay was set at 300 ng/µL, the highest concentration tested. At 0.5 ng/µL there was one no call due to low bead count and no assay failures therefore, the lower limit of detection was determined to be 0.5 ng/µL. The xTAG® CYP2C19 Kit v3 is optimized for use with 15 ng of total input DNA (3 µL of 5 ng/µL DNA), though the genomic DNA range is 1.5 to 900 ng for the xTAG® CYP2C19 Kit v3.

To validate the lower bound, forty replicates of the six samples were run at five concentrations within the assay range, which generated 1200 data points on both the Luminex 100/200 instrument and the MAGPIX® instrument across all samples and concentrations. The positive concordance was determined from the number of correct genotype calls. The lowest level at which a >95% positive concordance was obtained was 0.1 ng/ μ L (0.3 ng input DNA). Since this is a low input DNA concentration, the limit of detection for the system was set at 0.5 ng/ μ L (1.5 ng input DNA). The results

were as follows:

Luminex[®] 100/200TM Instrument with xPONENT[®] 3.1 Software

[Input DNA] (ng/µL)	Total Input DNA	Number of Samples with	Number of Incorrect	Number of No Calls	Positive Concordance	Lower Bound of 95%	Upper Bound of 95%
	(ng)	Correct Genotyping	Calls			CI	CI
50.0	150.0	239	0	1	239/240 = 99.58%	97.7%	99.99%
5.0	15.0	240	0	0	240/240 = 100%	98.47%	100.00%
2.0	6.0	240	0	0	240/240 = 100%	98.47%	100.00%
0.5	1.5	240	0	0	240/240 = 100%	98.47%	100.00%
0.05	0.15	65	0	175	65/240 = 27.03%	21.57%	33.18%

One 'No Call' was observed on the Luminex®100/200TM instrument with xPONENT 3.1 software for a sample at the 50 ng/ μ L concentration. A root cause investigation for the no-call at 50 ng/ μ L was carried out. After re-running this sample there were no further no calls. The no-calls observed at 0.05 ng/ μ L were below the limit of detection.

MAGPIX[®] Instrument with xPONENT[®] 4.2 Software

[Input DNA] (ng/µL)	Total Input DNA (ng)	Number of Samples with Correct	Number of Incorrect Calls	Number of No Calls	Positive Concordance	Lower Bound of 95% CI	Upper Bound of 95% CI
		Genotyping					
50.0	150.0	240	0	0	240/240 = 100%	98.47%	100.00%
5.0	15.0	240	0	0	240/240 = 100%	98.47%	100.00%
2.0	6.0	239	0	1	239/240 = 99.58%	97.70%	99.99%
0.5	1.5	240	0	0	240/240 = 100%	98.47%	100.00%
0.05	0.15	53	0	53	53/240 = 22.08%	17.00%	27.87%

One 'No Call' was observed on the MAGPIX® instrument with xPONENT 4.2 software for a sample at the 2 $ng/\mu L$ concentration. A root cause investigation for the

no-call at 2 ng/ μ L was carried out. After re-running this sample there were no further no calls. The no-calls observed at 0.05 ng/ μ L were below the limit of detection.

The limit of detection for the system was established at 0.5 ng/ μ L (1.5 ng input DNA). However, Luminex has chosen to be conservative in setting the bottom of the recommended range to be 2.0 ng/ μ L (6.0 ng total input DNA). The claimed assay range for the xTAG CYP2C19 Kit v3 is from 2.0 ng/ μ L (6.0 ng total DNA) to 300 ng/ μ L (900 ng total DNA).

e. Analytical specificity:

Six whole blood samples were tested on the Luminex $^{\circledR}$ 100/200TM instrument using the xPONENT $^{\circledR}$ 3.1 software and on the MAGPIX instrument with the xPONENT $^{\circledR}$ 4.2 software with and without spiking of the following substances to the stated concentration: albumin (6000 mg/dL); bilirubin (60 mg/dL); hemoglobin (500 mg/dL); and triglycerides (3000 mg/dL). The samples were extracted using three commercially available extraction methods. Elevated levels of lipids, bilirubin, hemoglobin and albumin in specimens did not interfere with the performance of the xTAG $^{\circledR}$ CYP2C19 Kit v3.

Potential carryover contamination was assessed by testing four genomic DNA samples of different genotypes at high and low concentrations. Five plates of samples were analyzed using the Luminex[®] 100/200TM instrument using the xPONENT[®] 3.1 software and on the MAGPIX[®] instrument with the xPONENT[®] 4.2 software with the following configuration: a high DNA concentration sample (300 ng), a low DNA concentration sample (7.5 ng) of a different genotype, followed by the high DNA concentration sample again, then a water blank. A total of 240 positive samples with a high input DNA concentration and 120 positive samples with a low input DNA concentration were successfully assayed. The frequency of carryover contamination in positive samples is 0%.

A total of 120 negative controls were tested and no negative control failures were observed on both the Luminex $^{\mathbb{R}}$ 100/200TM instrument using the xPONENT $^{\mathbb{R}}$ 3.1 software and on the MAGPIX instrument with the xPONENT 4.2 software. Therefore, the frequency of carryover contamination events for a negative control sample is estimated at 0%.

The frequency of carryover for positive samples and negative control samples met the acceptance criteria.

f. Assay cut-off:

Not Applicable

2. Comparison studies:

a. Method comparison with predicate device:

Method comparison studies were performed using bi-directional dideoxy-DNA sequencing as the comparator for the xTAG $^{\mathbb{R}}$ CYP2C19 Kit v3. 631 samples were tested; the samples were collected in either EDTA or citrate. The agreement between the xTAG $^{\mathbb{R}}$ CYP2C19 Kit v3 and sequencing for CYP2C19 alleles was 99.21% using the Luminex $^{\mathbb{R}}$ 100/200TM instrument using the xPONENT $^{\mathbb{R}}$ 3.1 software and 99.37% on the MAGPIX $^{\mathbb{R}}$ instrument with the xPONENT $^{\mathbb{R}}$ 4.2 software before allowable reruns. After the one re-run, the percent agreement was 100% for both instruments. The results on a "per allele" basis are summarized below.

		Total # of	# of Homozygous/#	Luminex® 100/200 TM with xPONENT® 3.1 Run Results				
Genotype	Allele	Alleles Sequenced	of Heterozygous Alleles	Correct Calls	Incorrect Calls	No Calls	Percent Agreement	
*1	N/A	519	217/302	516	0	3	99.42%	
*2	1915 4 G>A	247	32/215	245	0	2	99.19%	
*3	1794 8 G>A	24	1/23	24	0	0	100.00%	
*17	-806 C>T	195	27/168	194	0	1	99.49%	
Total		985	277/708	979	0	6	99.39%	

		Total # of	# of Homozygous/#	MAGPIX® instrument with the xPONENT® 4.2 Run Results				
Genotype	Allele	Alleles Sequenced	of Heterozygous Alleles	Correct Calls	Incorrect Calls	No Calls	Percent Agreement	
*1	N/A	519	217/302	517	0	2	99.61%	
*2	1915 4 G>A	247	32/215	245	0	2	99.19%	
*3	1794 8 G>A	24	1/23	24	0	0	100.00%	
*17	-806 C>T	195	27/168	194	0	1	99.49%	
Total		985	277/708	980	0	5	99.49%	

The percent agreement for genotype detection of the xTAG[®] CYP2C19 Kit v3 was calculated by determining the percentage of tested samples with the correct genotype assigned, compared to the total number of samples of that genotype. The results on a "per genotype" basis are summarized below.

	Luminex® 100/200 TM with xPONENT®								
	Total #	Total # of					95% One-		
Genotype	of	Replicates	# of	# of	# of	Percent	sided		
Genotype	Samples	Per	Correct	Incorrect	No	Agreement	Confidence		
	Tested	Sample	Calls	Calls	Calls	1 igi comone	Lower		
							Limit		
*1/*1	217	1	215	0	2	99.08%	96.71%		
*1/*2	165	1	164	0	1	99.39%	96.67%		
*1/*3	14	1	14	0	0	100.00%	76.84%		
*1/*17	123	1	123	0	0	100.00%	97.05%		
*2/*2	32	1	31	0	1	96.88%	83.78%		
*2/*3	7	1	7	0	0	100.00%	59.04%		
*2/*17	43	1	43	0	0	100.00%	91.78%		
*3/*3	1	1	1	0	0	100.00%	2.50%		
*3/*17	2	1	2	0	0	100.00%	15.81%		
*17/*17	27	1	26	0	1	96.30%	81.03%		
Total	631	1	626	1	5	99.21%	98.16%		

	Total #	Total # of	M	IAGPIX® wi	th xPON	ENT® 4.2 Re	sults
Genotype	of Samples Tested	Replicates Per Sample	# of Correct Calls	# of Incorrect Calls	# of No Calls	Percent Agreement	95% One- sided Confidence Lower Limit
*1/*1	217	1	216	0	1	99.54%	97.46%
*1/*2	165	1	164	0	1	99.39%	96.67%
*1/*3	14	1	14	0	0	100.00%	76.84%
*1/*17	123	1	123	0	0	100.00%	97.05%
*2/*2	32	1	31	0	1	96.88%	83.78%
*2/*3	7	1	7	0	0	100.00%	59.04%
*2/*17	43	1	43	0	0	100.00%	91.78%
*3/*3	1	1	1	0	0	100.00%	2.50%
*3/*17	2	1	2	0	0	100.00%	15.81%

*17/*17	27	1	26	0	1	96.30%	81.03%
Total	631	1	627	0	4	99.37%	98.38%

There were five 'No Calls' for data collected on the Luminex® 100/200TM instrument using the xPONENT® 3.1 software and four 'No Calls' for data collected on the MAGPIX® instrument using xPONENT® 4.2 software. There were no incorrect (wrong) calls on either instrument. The four samples that gave a 'No Call' on the MAGPIX® instrument were the same samples that gave a 'No Call' on the Luminex® 100/200TM instrument. New aliquots from the stock extracted material were prepared for all failed samples. The new aliquots were then re-run along with the original failing aliquot of each sample. In every case, the new aliquot made the correct call when compared to sequencing.

One run had high signal in the negative control leading to a plate failure. No data from this plate was utilized in accuracy calculations or analysis. The entire plate was re-run and the re-run data was included in the accuracy calculations.

b. Matrix comparison:

The performance of the xTAG® CYP2C19 Kit v3 was assessed on blood samples collected using different matrices in the precision (Section M.1.a) and method comparison study (Section M.2.a) above. Twenty five independent blood samples from anonymous donors were collected in EDTA and citrate blood collection tubes, extracted, and assayed with the xTAG® CYP2C19 Kit v3. There were no differences observed between the final genotyping calls made for the samples when they were collected in either EDTA or citrate anticoagulant; therefore, both matrices are compatible with the xTAG® CYP2C19 Kit v3.

3. Clinical studies:

a. Clinical Sensitivity:

Not Applicable

b. Clinical specificity:

Not Applicable

c. Other clinical supportive data (when a. and b. are not applicable): The following table lists the alleles recognized by the device, the single nucleotide polymorphisms (SNP's) recognized by the device for each allele, enzyme activity and references:

Alleles	SNPs	Exon	Predicted	Reference
	Detected		Enzyme	
			Activity	
*1	None		Normal	Romkes et al. 1991
				Richardson et al, 1995 Blaisdell et al, 2002
*2	19154G>A	Exon 5	None	de Morais et al, 1994a
				Ibeanu et al, 1998b
				Fukushima-Uesaka et al,
				2005
*3	17948 G>A	Exon 4	None	de Morais et al, 1994a
*17	-806C>T	Promoter	Increased	Sim et al, 2006
				Rudberg et al, 2008a

^{1,2} Bradford, L. D. (2002). "CYP2D6 allele frequency in European Caucasians, Asians, Africans and their descendants." Pharmacogenomics 3(2): 229-43.

4. Clinical cut-off:

Not Applicable

5. Expected values/Reference range:

Allele	Allele Frequency in		Frequency in	
	Caucasian	African Population	Asian Population	
	Population			
CYP2C19 *2	14.7%	17.3%	30.0%	
CYP2C19 *3	0.04%	0.4%	5.1%	
CYP2C19 *17	18-25%	18%	1.3-4%	

N. Proposed Labeling:

The labeling is sufficient and it satisfies the requirements of 21 CFR Part 809.10.

³ The frequency of the *29 allele in the U.S. population is not known; however, it is very common in Tanzanian Africans, with an allele frequency of 20 percent (Wennerholm, A., I. Johansson, et al. (2001). "Characterization of the CYP2D6*29 allele commonly present in a black Tanzanian population causing reduced catalytic activity." Pharmacogenetics 11 (5): 417-27).

⁴ Gaedigk, A., D. L. Ryder, et al. (2003). "CYP2D6 poor metabolizer status can be ruled out by a single genotyping assay for the -1584G promoter polymorphism." Clinical Chemistry 49(6 Pt 1): 1008-11.

O. Conclusion:

The submitted information in this premarket notification is complete and supports a substantial equivalence decision.